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EPA-Region III



r.e. wright associates, inc.
earth resources consultants

June 7, 1988

Mr. Michael Towle (3 HW12)
Remedial Project Manager
United States Environmental
Protection Agency
441 Chestnut Street
Philadelphia, PA 19107

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(Red)

Re: Keystone Sanitation Company
Landfill Site
Union Township, Adams County
Pennsylvania
EPA WA No. 01-3LL9
REWAI Project 88088

Dear Mr. Towle:

This letter is in reference to the comments of Mr. James Heenehan, Assistant Regional Counsel, in regards to what Mr. Heenehan perceives as an apparent contradiction between two reports prepared by R. E. Wright Associates, Inc. (REWAI) in response to the Keystone Sanitation Company (KSC) remedial investigation/feasibility study (RI/FS) work plan.

Reports commenting on the RI/FS work plan for the KSC landfill site were prepared by REWAI for both the Borough of Littlestown, Pennsylvania, and on behalf of Alloy Rods Corporation (ARC) and R. H. Shepherd Company, Inc. (RHS). [The report to the Borough of Littlestown resulted in a letter to the United States Environmental Protection Agency (EPA) from the president of Littlestown Borough Council, wherein, both technical matters identified by REWAI, and public health and safety concerns of Littlestown Borough Council, were addressed.] Both reports conclude that the potential threat to the water supply of Littlestown is minimal. This conclusion is explicitly stated in the first paragraph of the Littlestown letter and implied in the report for ARC/RHS. In addition, both reports also indicate that the sampling plans for groundwater, surface water, soils, and stream sediments are not sufficiently focused in order to determine whether or not the KSC site actually poses a threat or what the extent of any threat might be. In fact, the plan, as set forth, might make determination of the actual source of any

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contaminants discovered more difficult than if a more prudent sampling plan were proposed. The REWAI report, prepared for ARC and RHS, addressed this problem directly by seeking a phased approach to the sampling plan, such that as information is gathered and the direction of any contaminant migration is identified, the sampling program could be expanded in the appropriate direction indicated by the analytical data, and by migration flow dynamics and actual tested hydrogeologic parameters. The monitoring program should be implemented in phases, as required by the evolution of the data, and not in a predetermined pattern which does not take advantage of existing data. The report prepared for the Borough of Littlestown indicated also that some other sampling program was required. Indeed, the sampling program proposed by the Borough of Littlestown could be easily accommodated within the phased approach program identified in the report for ARC/RHS by implementing the Borough's plan as needed and indicated by any positive results obtained during the early sampling.

In its letter to the EPA, the Borough Council of Littlestown indicated that, because of its responsibility for public health and safety, it is gravely concerned over the landfill situation and equally gravely concerned over the apparent secondary status applied to its concerns as indicated in the work plan. The concern of Littlestown is that insufficient information may be known in order to fully document the situation and that concerns of the Borough (whether real or potential) have not been addressed. Both REWAI reports indicated that unless the sampling plan proceeds in a rational manner, any potential threats to any community can be misinterpreted if sampling and testing do not proceed in the direction indicated by existing and newly acquired data. For example, a well drilled randomly at some distance from the site, which might show contamination, could be construed as to have been contaminated by groundwater emanating from the landfill; whereas in reality, the source of contamination might be from some totally unrelated source. In either case, neither the Borough of Littlestown nor remediation at the Keystone landfill site are well served in that no one would know what the actual source of contamination might be, and, therefore, attempts to mitigate the contamination and its impacts would be futile.

In summary, while your agency may perceive a contradiction between the two reports, in reality, both reports convey the same message. The sampling plan should be modified such that a phased approach to sampling be implemented as additional information becomes available. The Borough Council of Littlestown clearly does not want to be left out of the information loop and is concerned from its perspective because, at this point in time, the potential threat, however minimal to groundwater supplies, has not been sufficiently addressed.

Mr. Michael Towle

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We trust that this letter helps you understand the position of REWAI in objectively representing both parties. If we can be of further assistance, please do not hesitate to contact us.

Very truly yours,

R. E. WRIGHT ASSOCIATES, INC.

Michael D. Haufler/ks

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cc: Mr. James Heenehan

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